### UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO.

Title III

as representative of

**PROMESA** 

THE COMMONWEALTH OF PUERTO RICO, et al.

(Jointly Administered)

No. 17 BK 3283-LTS

Debtors.1

# MOTION FOR ADMISSION PRO HAC VICE OF KEVIN D. McCULLOUGH

COMES NOW Kevin D. McCullough, applicant herein (the "Applicant") and respectfully states in support of his *Motion for Admission Pro Hac Vice* as follows:

1. Applicant is an attorney and partner of the law firm of Rochelle McCullough, LLP, with offices at:

#### ROCHELLE McCullough LLP

325 N. St. Paul, Suite 4500 Dallas, Texas 75201 P: (214) 953-0182 F: (214) 953-0185 kdm@RoMcLaw.com

- 2. Applicant will sign all pleadings with the name of Kevin D. McCullough.
- 3. Applicant has been retained as a member of the above-named firm by the Ad Hoc Puerto Rico Municipalities Committee to provide legal representation as co-counsel with the law

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

firm of Godreau & Gonzalez Law, LLC in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.

- 4. Applicant has been admitted to practice law in the State of Texas since November 5, 1993. Since January 7, 1994, Applicant has been and presently is a member in good standing of the bar of the United States District Court for the Northern District of Texas, where Applicant regularly practices law. Applicant's Texas Bar license number is 00788005.
  - 5. Applicant has been admitted to practice before the following jurisdictions:

Court	Admission Date
United States District Court, Northern District of Texas	01/07/1994
United States Bankruptcy Court, Northern District of Texas	1994
United States District Court, Eastern District of Texas	02/02/1995
United States Bankruptcy Court, Eastern District of Texas	1995
United States District Court, Southern District of Texas	11/03/1995
United States Bankruptcy Court, Southern District of Texas	1995
United States District Court, Western District of Texas	11/12/1997
United States Bankruptcy Court, Western District of Texas	1997
United States Court of Appeals for the Fifth Circuit	2017

- 6. Applicant is a member in good standing of the bars of the courts listed in the paragraph above.
- 7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.
- 8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.
  - 9. Local counsel of record associated with Applicant in this matter is:

Rafael A. Gonzales Valiente USDC NO. 225209 Godreau & Gonzalez Law, LLC P.O. Box 9024176 San Juan, PR 00902-4176 Telephone: 787-726-0077 rgv@g-glawpr.com

- 10. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico and will comply with same.
- 11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth herein and pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee shall be completed either through the CM/ECF payment system (using pay.gov website) or by attaching herewith a check or money order payable to: "Clerk, U.S. District Court"

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

Dated: July 26, 2017.

Respectfully submitted,

/s/ Kevin D. McCullough
Kevin D. McCullough pro hac vice pending
Texas Bar No. 00788005
ROCHELLE McCullough LLP
325 N. St. Paul, Suite 4500
Dallas, Texas 75201
P: (214) 953-0182
F: (214) 953-0185
kdm@RoMcLaw.com

Attorney for Ad Hoc Puerto Rico Municipalities Committee I HEREBY CERTIFY, pursuant to Local Rule 83A(f), that I consent to the designation of local counsel of record for all purposes.

Dated: July 26, 2017.

Respectfully submitted,

/s/ Rafael A. Gonzalez Valiente
Rafael A. Gonzales Valiente
USDC NO. 225209
Godreau & Gonzalez Law, LLC
P.O. Box 9024176
San Juan, PR 00902-4176
Telephone: 787-726-0077
rgv@g-glawpr.com

Attorney for Ad Hoc Puerto Rico Municipalities Committee

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system of the U.S. Bankruptcy Court for the District of Puerto Rico for Case No. 17 BK 3283, which will send notification of such filing to all attorneys of record, the original was served upon the Clerk of Court on July 26, 2017, accompanied by a \$300 pro hac vice admission fee.

Dated: July 26, 2017.

/s/ Kevin D. McCullough
Kevin D. McCullough pro hac vice pending
Texas Bar No. 00788005
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325 N. St. Paul, Suite 4500
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/s/ Rafael A. Gonzalez Valiente
Rafael A. Gonzales Valiente
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## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	PROMESA Title III
as representative of THE COMMONWEALTH OF PUERTO RICO, et al.	No. 17 BK 3283-LTS (Jointly Administered)
Debtors. <sup>2</sup>	

# ORDER GRANTING ADMISSION PRO HAC VICE OF KEVIN D. McCULLOUGH

The Court, having considered the Motion for Admission Pro Hac Vice of Kevin D.
McCullough, orders that:
the application be granted. The Clerk of Court shall deposit the admission fee to the
account of Non-Appropriated Funds of this Court.
the application be denied. The Clerk of the Court shall return the admission fee to
the applicant.
SO ORDERED.
In San Juan, Puerto Rico, on, 2017.
The smallest and the state of t
Honorable Laura Taylor Swain United States District Judge

<sup>&</sup>lt;sup>2</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).